

EXHIBIT 3

Clark, Andrew W.

From: John Comerford <jcomerford@dowdbennett.com>
Sent: Wednesday, December 9, 2020 6:50 PM
To: [REDACTED]; 'Golladay, Kenny'
Cc: 'Colvin, Jay'; Jimmy Martin; Lamb, Jeffrey K.; Clark, Andrew W.; miaconelli@klehr.com; 'Clements, William'; 'Iles Cooper'; 'JT Herber'
Subject: RE: Motion to Enforce Rule 45 Subpoena

Mr. Golladay,

I have received Mr. Colvin's email below in which he makes clear that our process server will not be admitted to the Allen Park facility for the purpose of effectuating personal service. In light of this, would you please agree to accept service by email of our Motion to Enforce the Rule 45 subpoena? Alternatively, would you please provide us with the name of an attorney that represents you in this matter, if there is one, so we can correspond with that person? And finally, if you do not agree to accept service of the Motion, please provide your current home address so we may serve you there.

Thank you,
John Comerford

From: Colvin, Jay <Jay.Colvin@lions.nfl.net>
Sent: Wednesday, December 09, 2020 12:28 PM
To: John Comerford <jcomerford@dowdbennett.com>; [REDACTED]; Golladay, Kenny <[REDACTED]>
Cc: Jimmy Martin <jbmartin@dowdbennett.com>; Lamb, Jeffrey K. <JLamb@honigman.com>; Clark, Andrew W. <AClark@honigman.com>; miaconelli@klehr.com; Clements, William <WClements@klehr.com>; Iles Cooper <icooper@wfjlaw.net>; JT Herber <jherber@wfjlaw.net>
Subject: RE: Motion to Enforce Rule 45 Subpoena

Dear Mr. Comerford:

As you know, I do not represent Mr. Golladay and my authorization under MCR 2.105(H) to accept service as his agent was limited to a single discrete pleading. That authorization does not extend to your current Motion.

More importantly, and to your statement below, please be advised that a process server will not be admitted to the Allen Park facility even for the purpose of effectuating personal service. This restriction is not imposed with the intent to (or for the purpose of) interfering with service of process on Mr. Golladay; our current restricted access policy has been put in place due to legitimate health and safety concerns and follows current NFL protocols prohibiting access to team facilities by anyone other than essential football personnel who have undergone continuous Covid-19 testing.

Regards,

Jay Colvin



JAY COLVIN / SR. VP OF LEGAL AFFAIRS AND GENERAL COUNSEL

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From: John Comerford <jcomerford@dowdbennett.com>

Sent: Tuesday, December 8, 2020 9:14 PM

To: Colvin, Jay <Jay.Colvin@lions.nfl.net>; [REDACTED]; Golladay, Kenny
<[REDACTED]>

Cc: Jimmy Martin <jbmartin@dowdbennett.com>; Lamb, Jeffrey K. <JLamb@honigman.com>; Clark, Andrew W. <AClark@honigman.com>; miaconelli@klehr.com; Clements, William <WClements@klehr.com>; Iles Cooper <icooper@wfilaw.net>; JT Herber <jherber@wfilaw.net>

Subject: Motion to Enforce Rule 45 Subpoena

EXTERNAL EMAIL - Use caution with links & attachments

Dear Mr. Golladay and Mr. Colvin,

Having heard no response to my various emails, we have filed a Motion to Enforce the Rule 45 Subpoena in the United States District Court for the Eastern District of Michigan. We need to effectuate service of this motion on Mr. Golladay and can send a process server to the Lions facility to do so, as we did with the subpoena. Please let us know if Mr. Golladay would agree to accept service of the motion without the need for a process server.

Copies of the motion and exhibits are attached. I have copied the attorneys for CAA Sports and Todd France (Mr. Golladay's agent) as well as the other attorneys involved in the underlying litigation. I understand that Mr. Colvin has spoken with Mr. France's attorneys about the subpoena we served on Mr. Golladay.

Thank you,
John

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